

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION**

ANDREW HAYES

Plaintiff,

vs.

ST. MATTHEWS
POLICE
DEPARTMENT., and
MICHAEL SMALLS,
JR., individually,

Defendants.

Case No.: 5:15-4486-JMC

**PLAINTIFF'S RULE 26.01
RESPONSES**

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None.

- B. As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Plaintiff has demanded a jury trial on all claims.

- C. State whether the party submitting these responses is a publicly owned company and separately identify. (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: The plaintiff is an individual.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: The plaintiff worked for the defendant in Calhoun County, South Carolina, made his FLSA inquiries in Calhoun County, and he was subjected to reprisal and termination at that location.

- E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide : (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.
- Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

GIBBS & HOLMES

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